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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
12

13 IN RE: HIGH-TECH EMPLOYEE
14 ANTITRUST LITIGATION

Master Docket No. 11-CV-2509-LHK

15 THIS DOCUMENT RELATES TO:
16 ALL ACTIONS
17
18
19

**EXHIBIT 6 TO DECLARATION OF
CHRISTINA BROWN IN SUPPORT
OF DEFENDANTS' OPPOSITION TO
PLAINTIFFS' SUPPLEMENTAL
MOTION FOR CLASS
CERTIFICATION**

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
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5 IN RE: HIGH-TECH EMPLOYEE)
6 ANTITRUST LITIGATION) No. 11-CV-2509-LHK
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10 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
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13 VIDEOTAPED DEPOSITION OF SIDDHARTH HARIHARAN
14 San Francisco, California
15 Friday, October 12, 2012
16 Volume I
17
18
19

20 Reported by:
21 ASHLEY SOEVYN
22 CSR No. 12019
23 Job No. 1541277
24

25 PAGES 1 - 310

Page 1

1	A.	Nope.	11:32:11
2	Q.	You were reasonably content with the	11:32:13
3		prospect of getting a 17,000-plus raise?	11:32:15
4	A.	Correct.	11:32:18
5	Q.	It didn't bother you that your friend who	11:32:19
6		was slightly more experienced was making \$12,000	11:32:24
7		more than you?	11:32:27
8	A.	Well, I -- I don't recall. I wouldn't say	11:32:31
9		necessarily, but he was a little bit more	11:32:37
10		experienced than me at the time. I don't think I --	11:32:40
11		I can't remember if I -- I thought about it much.	11:32:44
12		I'm not sure.	11:32:45
13	Q.	Did you ever use the \$72,000 figure that he	11:32:47
14		had given to you as a basis for renegotiating your	11:32:50
15		compensation with EA?	11:33:00
16	A.	No.	11:33:01
17	Q.	After you joined EA, did you have	11:33:01
18		discussions with any co-workers about relative	11:33:04
19		salaries that people were making?	11:33:10
20	A.	Yes.	11:33:12
21	Q.	Did that happen often?	11:33:13
22	A.	No.	11:33:14
23	Q.	Just occasionally?	11:33:15
24	A.	Yes.	11:33:16
25	Q.	On roughly how many occasions do you recall	11:33:18

1 during your time at EA, where you had discussions 11:33:21
2 with your co-workers about relative salaries? 11:33:25
3 A. I wouldn't be able to say. 11:33:33
4 Q. More than a dozen? 11:33:35
5 A. Maybe. Maybe just under a dozen, maybe a 11:33:40
6 little bit more. 11:33:44
7 Q. What was the overall impression that you 11:33:45
8 got from these discussions about salaries with 11:33:47
9 co-workers? Did you feel you were being paid 11:33:49
10 fairly, based on what you heard from your peers? 11:33:54
11 A. You see, I wasn't too focused on my salary 11:34:07
12 while I was working at EA necessarily, but I was 11:34:11
13 just focused on doing my job. I cared about my 11:34:14
14 work. I was head down in my work. As long as the 11:34:22
15 system wasn't taking advantage of me, which I didn't 11:34:25
16 feel at the time they were, I was okay with what I 11:34:28
17 was getting paid. 11:34:31
18 Q. Did you ever use any of the information 11:34:35
19 that you got from your co-workers about salary while 11:34:38
20 you were at EA as the basis for going to your leader 11:34:42
21 and your manager and asking for more money? 11:34:47
22 A. During my time at EA, I never asked for 11:34:50
23 more money. 11:34:54
24 Q. Did you ever feel that you ought to be 11:34:58
25 getting paid more money? 11:34:59

1 A. Sure, there were times where I could have 11:35:03
2 used more. But like I said -- said earlier, I was 11:35:05
3 focused on my work. And as long as I felt that the 11:35:12
4 company was not doing anything shady, I was okay 11:35:16
5 with what I was getting paid because I was getting, 11:35:25
6 you know, knowledge as well. 11:35:29

7 Q. After you -- you started at EA at a \$60,000 11:35:31
8 a year salary, did your salary ever increase during 11:35:34
9 your time at EA? 11:35:38

10 A. Yes, it increased automatically after my 11:35:40
11 first performance review where just suddenly my 11:35:45
12 paycheck happened to be a little bit higher. I 11:35:49
13 think it was 61-. 11:35:52

14 Q. Was that -- you said "automatically." That 11:35:55
15 was EA practice if somebody passed their first 11:35:59
16 performance review, they would get a slight salary 11:36:02
17 bump? 11:36:05

18 A. I don't know if it was EA practice. I just 11:36:06
19 know that I looked at my paycheck and it was a 11:36:09
20 little higher. 11:36:13

21 Q. Fair enough. After that initial slight 11:36:13
22 increase in your paycheck at EA, did you have any 11:36:16
23 other subsequent salary increases while you were at 11:36:19
24 EA? 11:36:26

25 A. No, I didn't have any subsequent salary 11:36:27

1 I declare under penalty of perjury under the
2 laws of the State of California that the foregoing
3 is true and correct.

4
5 Executed on _____, 2012,
6 at _____, _____.

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11 _____
12 SIDDHARTH HARHARIHAN
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1 STATE OF CALIFORNIA) ss:
2 COUNTY OF MARIN)
3

4 I, ASHLEY SOEVYN, CSR No. 12019, do hereby
5 certify:

6 That the foregoing deposition testimony was
7 taken before me at the time and place therein set
8 forth and at which time the witness was administered
9 the oath;

10 That the testimony of the witness and all
11 objections made by counsel at the time of the
12 examination were recorded stenographically by me,
13 and were thereafter transcribed under my direction
14 and supervision, and that the foregoing pages
15 contain a full, true and accurate record of all
16 proceedings and testimony to the best of my skill
17 and ability.

18 I further certify that I am neither counsel for
19 any party to said action, nor am I related to any
20 party to said action, nor am I in any way interested
21 in the outcome thereof.

22 IN THE WITNESS WHEREOF, I have transcribed my
23 name this 22nd day of October, 2012.
24

25 _____
ASHLEY SOEVYN, CSR 12019